

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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CHERYL SAGATAW, DEANTHONY  
BARNES, ROBERTA STRONG, TRAVIS  
NELOMS, ALVIN BUTCHER, ADRIAN  
TIGER, CHANCE ASKENETTE, DEVEN  
CASTON, LOLA HEGSTROM, and  
RONDEL APPLEBEE, *on behalf of  
themselves and a class of similarly-situated  
individuals,*

Plaintiffs,

vs.

MAYOR JACOB FREY, *in his individual  
and official capacity,*

Defendant.

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Civil Action

0:24-cv-00001-ECT/TNL

**MEET AND CONFER  
STATEMENT ON MOTION TO  
EXTEND FACTUAL  
DISCOVERY DEADLINE**

Plaintiffs' attorney Kira Kelley and Defendant's attorney Sharda Enslin have conferred regarding the Plaintiffs' Motion to Extend Factual Discovery Deadline, and the following discussion was had:

1. Initially, Defendant expressed willingness to stipulate to an extension of the factual discovery deadline to Dec. 22, 2024, given the City's unavailability for a 30(b)(6) deposition until after the Dec. 15, 2024 deadline had passed.

2. Plaintiffs responded, requesting to extend the factual discovery deadline to January 15, 2024, given that the 30(b)(6) deposition traditionally informs subsequent depositions and written requests for discovery.

3. Defendant responded, saying that the deponent was now available prior to the December 15 factual discovery deadline and clarified that the City would not stipulate to any discovery deadline extension.

Respectfully submitted,

Dated: December 3, 2024

s/Kira Kelley  
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